

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

STUDENTS FOR FAIR ADMISSIONS, INC.,

Plaintiff,

v.

PRESIDENT AND FELLOWS OF HARVARD
COLLEGE (HARVARD CORPORATION),

Defendant.

Civil Action No. 1:14-cv-14176-ADB

PLAINTIFF'S ASSENTED-TO MOTION TO FILE UNDER SEAL
PLAINTIFF'S MOTIONS TO COMPEL

Pursuant to Local Rule 7.2 and this matter's Stipulated Protective Order (Dkt. No. 55), Plaintiff, Students for Fair Admissions, Inc. ("SFFA"), hereby brings this assented-to motion seeking an order to file under seal two motions to compel. SFFA's first motion to compel seeks the production of applicant summary sheets and reviewer comments from Defendant's Admissions Office that relate to race. SFFA's second motion to compel seeks the production of applicant zip codes for purposes of the race-neutral alternative analysis being conducted by SFFA's expert. Both of these motions contain substantial information that has been designated by Defendant as Confidential and/or Highly Confidential – Attorneys' Eyes Only pursuant to the Stipulated Protected Order. To comply with Defendant's designations, SFFA requests an order that allows these two motions and all accompanying exhibits to be filed under seal in their entirety. Pursuant to Local Rule 7.1(a)(2), Defendant was made aware of this motion and assents to it.

WHEREFORE, SFFA respectfully requests that the Court grant this motion and allow SFFA's two motions to compel and all accompanying exhibits to be filed under seal until further order of the Court and to be viewed only by the Judge, her clerk(s), and Court personnel.

Respectfully submitted,

By: /s/ Benjamin C. Caldwell

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Dated: December 1, 2016

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Counsel for Plaintiff Students for Fair Admissions, Inc.

CERTIFICATE OF CONFERENCE

In accordance with Local Rules 7.1(a), I hereby certify that Defendant's counsel was made aware of this motion before it was filed and assents to the relief requested therein.

/s/ Benjamin C. Caldwell

CERTIFICATE OF SERVICE

I hereby certify that this document filed through the CM/ECF system will be sent electronically to all counsel of record via the CM/ECF system.

/s/ Benjamin C. Caldwell

4836-7997-1645.1